

REMARKS

Claims 1-53 were previously pending in this patent application. Claims 1-53 stand rejected. Herein, Claims 1, 19, 29, 32, 36, 48, 50, and 52 have been cancelled. New Claims 54-61 have been added. Claims 2, 8, 11, 15, 16, 17, 18, 20, 26, 30, 31, 33, 34, 35, 37, 38, 39, 40, 41, 42, 45, 49, 51, and 53 have been amended. Accordingly, after this Amendment and Response, Claims 2-18, 20-28, 30-31, 33-35, 37-47, 49, 51, 53, and 54-61 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

35 U.S.C. Section 103(a) Rejections

Claims 1-3, 5-7, 11-15, 17, 19-21, 23-25, 36, 38, 40, 41, and 45-53 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Voice Commerce (a collection of articles cited in Paper #18, PTO-892, Items: U-X and VV, and PTO-892, Item: U; hereafter referred to as "VC") in view of PR Newswire (Paper #18 PTO-892, Item: UU). These rejections are respectfully traversed.

Independent Claims 1, 19, 36, 48, 50, and 52 have been canceled. Moreover, dependent Claims 2-3, 5-7, 11-15, and 17 now depend from new Independent Claim 54. Dependent Claims 20-21 and 23-25 now depend from new Independent Claim 55. Dependent Claims 38, 40-41, and 45-47 now depend from new Independent Claim 58. Dependent Claim 49 now depends from new Independent Claim 59. Dependent Claim 51 now depends from new

Independent Claim 60. Dependent Claim 53 now depends from new

Independent Claim 61

New Independent Claim 54 recites:

A method of facilitating an electronic commerce transaction, the method comprising:

operating a computer system ***independently of and separately from*** a second computer system utilized by a merchant to provide electronic commerce, wherein the computer system is configured ***to respond to an audio command representing an audio purchase request received via a telephone interface system of the computer system;***

in response to receiving the audio purchase request, ***causing the computer system to establish a communication link with the second computer system;*** and

causing the computer system to electronically interact with the second computer system to perform the electronic commerce transaction initiated by the audio purchase request. (emphasis added)

It is respectfully asserted that the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) does not teach, suggest, or motivate the invention of Independent Claim 54. In particular, the Independent Claim 54 recites the limitations, "operating a computer system ***independently of and separately from*** a second computer system utilized by a merchant," (emphasis added), "the computer system is configured ***to respond to an audio command representing an audio purchase request received via a telephone interface system of the computer system,***" (emphasis added), and "***in response*** to receiving the audio purchase request, ***causing the computer system to establish a communication link with the second computer system***"

(emphasis added). In contrast, the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) disclose integrating/combining/embedding/adding natural language speech recognition to systems to enable performance of self-service transactions over the telephone and other voice-initiated transactions. However, the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) does not disclose operating a computer system independently of and separately from a second computer system utilized by a merchant, wherein the computer system is configured to respond to an audio command representing an audio purchase request received via a telephone interface system of the computer system, as in the invention of Independent Claim 54. Also, the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) does not disclose in response to receiving the audio purchase request, causing the computer system to establish a communication link with the second computer system, as in the invention of Independent Claim 54. Therefore, it is respectfully submitted that Independent Claim 54 is patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) and is in condition for allowance.

Dependent Claims 2-3, 5-7, 11-15, and 17 are dependent on allowable Independent Claim 54, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 2-3, 5-7, 11-15, and 17 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above.

With respect to Independent Claims 55 and 58-61, it is respectfully submitted that Independent Claims 55 and 58-61 recite similar limitations as in Independent Claim 54. Therefore, Independent Claims 55 and 58-61 are allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for reasons discussed in connection with Independent Claim 54.

Dependent Claims 20-21 and 23-25, Dependent Claims 38, 40-41, and 45-47, Dependent Claim 49, Dependent Claim 51, and Dependent Claim 53 are dependent on allowable Independent Claims 55 and 58-61 respectively, which are allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 20-21 and 23-25, Dependent Claims 38, 40-41, and 45-47, Dependent Claim 49, Dependent Claim 51, and Dependent Claim 53 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above.

Claims 4, 22, and 39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Voice Commerce (a collection of articles cited in Paper #18, PTO-892, Items: U-X and VV, and PTO-892, Item: U; hereafter referred to as "VC") in view of PR Newswire (Paper #18 PTO-892, Item: UU), further in view of Official Notice. These rejections are respectfully traversed.

Dependent Claim 4 is dependent on allowable Independent Claim 54, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claim 4 is patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, the Official Notice does not disclose the claim limitations as recited in Independent Claim 54. Thus, it is respectfully submitted that Dependent Claim 4 is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Official Notice for the reasons discussed above.

Dependent Claim 22 is dependent on allowable Independent Claim 55, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claim 22 is patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, the Official Notice does not disclose the claim limitations as recited in Independent Claim 55. Thus, it is respectfully submitted that Dependent Claim 22 is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Official Notice for the reasons discussed above.

Dependent Claim 39 is dependent on allowable Independent Claim 58, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claim

39 is patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, the Official Notice does not disclose the claim limitations as recited in Independent Claim 58. Thus, it is respectfully submitted that Dependent Claim 39 is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Official Notice for the reasons discussed above.

Claims 8-10, 26-35, 37, and 42-44 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Voice Commerce (a collection of articles cited in Paper #18, PTO-892, Items: U-X and VV, and PTO-892, Item: U; hereafter referred to as "VC") in view of PR Newswire (Paper #18 PTO-892, Item: UU), in further in view of Business Wire (Paper #18 PTO-892, Item: WW). These rejections are respectfully traversed.

Independent Claims 29 and 32 have been canceled. Moreover, Dependent Claims 30-31 now depend from new Independent Claim 56. Dependent Claims 33-35 now depend from new Independent Claim 57.

Dependent Claims 8-10 are dependent on allowable Independent Claim 54, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 8-10 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, Business Wire

(Paper #18 PTO-892, Item:WW) does not disclose the claim limitations recited in Independent Claim 54. Thus, it is respectfully submitted that Dependent Claims 8-10 are allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

Dependent Claims 26-28 are dependent on allowable Independent Claim 55, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 26-28 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, Business Wire (Paper #18 PTO-892, Item:WW) does not disclose the claim limitations recited in Independent Claim 55. Thus, it is respectfully submitted that Dependent Claims 26-28 are allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

With respect to Independent Claim 56, it is respectfully submitted that Independent Claim 56 recites similar limitations as in Independent Claim 54. Thus, it is respectfully submitted that Independent Claim 56 is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above in connection with Independent Claim 54. Moreover, Business Wire (Paper #18 PTO-892, Item:WW) does not disclose the claim limitations recited in Independent Claim 56. Thus, it is respectfully submitted

that Independent Claim 56 is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

Dependent Claims 30-31 are dependent on allowable Independent Claim 56, which is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW). Hence, it is respectfully submitted that Dependent Claims 30-31 are patentable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

With respect to Independent Claim 57, it is respectfully submitted that Independent Claim 57 recites similar limitations as in Independent Claim 54. Thus, it is respectfully submitted that Independent Claim 57 is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above in connection with Independent Claim 54. Moreover, Business Wire (Paper #18 PTO-892, Item:WW) does not disclose the claim limitations recited in Independent Claim 57. Thus, it is respectfully submitted that Independent Claim 57 is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

Dependent Claims 33-35 are dependent on allowable Independent Claim 57, which is allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW). Hence, it is respectfully submitted that Dependent Claims 33-35 are patentable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

Dependent Claims 42-44 are dependent on allowable Independent Claim 58, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 42-44 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, Business Wire (Paper #18 PTO-892, Item:WW) does not disclose the claim limitations recited in Independent Claim 58. Thus, it is respectfully submitted that Dependent Claims 42-44 are allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Business Wire (Paper # 18 PTO-892, Item:WW) for the reasons discussed above.

Claims 16 and 18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Voice Commerce (a collection of articles cited in Paper #18, PTO-892, Items: U-X and VV, and PTO-892, Item: U; hereafter referred to as

"VC") in view of PR Newswire (Paper #18 PTO-892, Item: UU), further in view of Official Notice. These rejections are respectfully traversed.

Dependent Claims 16 and 18 are dependent on allowable Independent Claim 54, which is allowable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU). Hence, it is respectfully submitted that Dependent Claims 16 and 18 are patentable over the combination of VC and PR Newswire (Paper #18 PTO-892, Item: UU) for the reasons discussed above. Moreover, the Official Notice does not disclose the claim limitations as recited in Independent Claim 54. Thus, it is respectfully submitted that Dependent Claims 16 and 18 are allowable over the combination of VC, PR Newswire (Paper #18 PTO-892, Item: UU), and Official Notice for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above claims, remarks, and arguments overcome all rejections and objections. All remaining claims (Claims 2-18, 20-28, 30-31, 33-35, 37-47, 49, 51, 53, and 54-61) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 2-18, 20-28, 30-31, 33-35, 37-47, 49, 51, 53, and 54-61) are in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,

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